

Veronique Eliason, Trustee and Agent for Max D Eliason  
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Plaintiff is Self-Represented "Pro Se"

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH**

Court Address: 351 S West Temple, SLC UT 84111

**THE ESTATE OF MAX AND JOYCE  
ELIASON AND MAX D ELIASON  
AS A PROTECTED PERSON UNDER  
THE LAWS OF THE STATE OF UTAH**

**VERONIQUE ELIASON, AGENT  
AND TRUSTEE**

\_\_\_\_\_  
**PLAINTIFF**

v.

**GOVERNOR SPENCER J COX  
THE STATE OF UTAH**

\_\_\_\_\_  
**DEFENDANT**

**SUMMONS AND COMPLAINT**

**FILED IN UNITED STATES DISTRICT  
COURT, DISTRICT OF UTAH**

**SEP 16 2024**

**GARY P. SERDAR  
CLERK OF COURT**

**BY**

**DEPUTY CLERK**

Case: 1:24-cv-00148  
Assigned To : Oberg, Daphne A.  
Assign. Date : 9/16/2024  
Description: Eliason v. Cox et al

Plaintiff Veronique Eliason, acting as the Agent and Trustee for Max D Eliason, hereby files this complaint against The State of Utah and Governor Spencer J Cox relating to the multiple cases which have been filed against Kirton McConkie and the LDS Church. The State of Utah continues to refuse Plaintiff the right to a hearing or a jury trial due to the extensive corruption this matter will expose among the leaders of both The Church and The State.

**Governor Cox,**

It is your responsibility in your position as governor to make certain the laws are upheld in the State of Utah, and you swore an oath to do so while stating the following words:

***I do solemnly swear (or affirm) that I will support, obey, and defend the Constitution of the United States and the Constitution of the State of Utah, and that I will discharge the duties of my office with fidelity.***

Well, here is your chance to show you will indeed defend the Constitution of both the United States and the State of Utah; something which the judges in each of the District Courts of Utah refuse to do. Unfortunately, I am already certain you have no intention of seeing the criminals prosecuted because you too will protect the felons who embezzled my parents' estate to protect Dallin Oaks and the LDS Church.

I already know in advance that you will either ignore this complaint entirely as has been the case with McConkie and the LDS Church for over five years and counting, claim you were not served correctly and request the matter be quashed like President Oaks, or you will take the most popular choice and slander the Plaintiff claiming it is vexatious to demand accounting from the defendants.

I cannot imagine being in a position such as yours, and betraying those who entrusted you with the highest position in the State of Utah. You are a former attorney who clearly understands the ongoing crimes which are being committed by Kirton McConkie and the LDS Church leaders and have chosen to become an accomplice in this mockery of justice.

Imagine for a moment you were in the position of my parents, Max and Joyce Eliason and were led down the same road Kirton McConkie has done to my family. Can you understand for a minute the horror my mother lived in the last few days of her life knowing Craig McCullough and Lisa Stephens had slammed her with morphine and forced her to sign away her estate while giving Craig the right to create any beneficiaries of his choosing?

Now imagine the pain you would suffer upon realizing the betrayal one of your children has made against you and your wife, and has been plotting a five-year plan with the Lord's Lawyers to take out your other children such is the case with me and my sister. I am more than certain you are fully aware of what has happened including the fact that this has been filed over 30 times within the Third District Court and the US District Court of Utah. How are you going to explain this to the public Brother Cox?

Now imagin for a moment that you have been begging for anyone in the State or Federal Government to please stop the retaliatory assaults which include being divorced from your spouse through fraudulent documents and being denied the right to see your own father. And on top of that, you are faced with a two-faced governor who has no intention of upholding the Constitution.

I too was a missionary for the LDS Church and served in Paris France where I met my wife to whom I have been married to for 36 years, and have two beautiful daughters who are also victims of these garment wearing lies. Are you a more worthy candidate than I am to have the rights you deny me by refusing to act against these felons at large? Are your four children more privileged than mine because you became a member of the elite members of society where we peasants are here to serve you as a public servant?

Tell me Mr. Cox, do you believe you are entitled to another term as Governor when you are deceitfully and criminally protecting the corrupt from the victims? How many of the partners from Kirton McConkie and Parsons Behle are taking you to lunch or passing you contributions in exchange for a vote in their favor? Based on the evidence sitting in plain day against McCullough et al, you maybe have your very own Charitable trust Craig set up in your name to shut your corrupt mouth?

What else am I to believe sir? With you in charge of enforcing the laws of the State and fighting corruption, its Christmas everyday for those who are feasting upon their innocent victims such as my parents who were foolish enough to trust their estate was just as safe as their tithes and offerings (oops). You are protecting the largest scam in history and your legacy shall be one of betrayal and criminal cover-up unlike any other seen by a Governor in history.

I wonder if you send out a weekly email to each judge in the State reminding them to do everything they can to make certain we as victims are denied our rights, or else they too would be exposed as criminals as if they were Craig McCullough themselves. I imagine when you appoint a new judge to serve like you did this past week, you make it clear in advance that they obey a secret oath sworn between your special union of corrupt hoodlums, or else they will be treated to the same punishment Kirton McConkie has bestowed upon me and my family.

Understand this Governor, while you sit in the mansion which is paid for by the taxpayers you claim to represent as a public servant, me and my family were evicted from our own home with the assistance of a very sleazy Judge Cornish and an equally criminal judge Mark Kouris. Did you give them accolades for obeying the desires of McConkie regardless of what the law says, and give them a bump in the judges' retirement fund?

Your refusal to enforce the laws and uphold the Constitution of the State of Utah and the United States of America should place you and your pals on posters as America's most wanted, and it is certain that is exactly what will happen when the truth is told about how the entire Church and State has become the mob warned of by Joseph Smith himself. If you have studied the Book of Mormon more than Dallin, you should review the scriptures in 3 Nephi which describes the present day in Utah perfectly...

# Corrupt judges destroyed the government

October 15, 2018 by Brian Ferguson

"And now it came to pass that when Nephi had said these words, behold, there were men who were **judges, who also belonged to the secret band of Gadianton**, and they were angry, and they cried out against him. And **those judges were angry** with him because **he spake plainly unto them concerning their secret works of darkness.**" (Helaman 8:1,4)

In the Book of Mormon, **the secret band of Gadianton was determined to permanently take over the government by appointing Judges** who would serve the wealthy at the expense of the working people.

In 3 Nephi, chapter 6, the Lord began to send forth men "preaching and **testifying boldly of the sins and iniquities of the people.**" (3 Nephi 6:20). This upset many of the rich and powerful.

*Now there were many of the people who were exceedingly angry because of those who testified of these things; and **those who were angry were chiefly the chief judges**, and they who had been **high priests** and lawyers; yea, **all those who were lawyers were angry** with those who testified of these things. (3 Nephi 6:21)*

The powerful priests and lawyers were so **upset at their lies and secret activities being exposed**, that many "who testified boldly" against their sins, "were taken and put to death secretly by the judges." (3 Nephi 6:23).

Eventually, the judges who had killed these prophets were brought before the governor of the land to be tried for their crimes. However, the accused judges "had many friends and kindreds" who **conspired together "to deliver those who were guilty of murder** from the grasp of justice." (3 Nephi 6:27-29)

*And they did set at defiance the law and the rights of their country; and **they did covenant one with another to destroy the governor**, and to establish a king over the land, **that the land should no more be at liberty** but should be subject unto kings. (3 Nephi 6:30)*

Note the part where the judges conspired together to deliver those who were guilty of the murder of my mother, and voila; we have a great speech for Dallin at the next General Conference. But in the scriptures, the Governor was a just man who was not a part of the secret societies so maybe there is still a glimmer of hope that you will "choose the right."

## **PARTIES, JURISDICTION, AND VENUE**

1. Max D Eliason, Plaintiff, is an individual residing at 4349 Lynne Lane in Salt Lake City, Utah; whose entire estate has been embezzled while he is still alive by Kirton McConkie as an agent for the Church of Jesus Christ of Latter-Day Saints. When Kirton McConkie realized they had been caught robbing their client blind, they dragged Mr. Eliason in front of Judge Robert Faust in May of 2019 to have him deemed incompetent which is why he is now a protected person under the laws of the State of Utah.
2. Veronique Eliason, Plaintiff, is the acting Agent and Trustee who is representing Max D Eliason since Kirton McConkie deceived him into believing McCullough represented him and Joyce Eliason as the Settlers, but instead is unlawfully representing Lisa Stephens and her husband as the greedy beneficiary who betrayed her entire family.
3. Spencer J Cox, Defendant, is the acting Governor for the State of Utah who is responsible for upholding the Constitution of both the State and the United States but who is concealing the dozens of Rico crimes to protect the criminals from prosecution.
4. Jurisdiction and Venue are proper for this Court pursuant to Utah Code Ann. §78A-5-102
5. This Court has authority to enter a declaratory judgment pursuant to Utah Code Ann. §78B-6-401 *et. seq.*

## **GENERAL ALLEGATIONS**

6. Plaintiff restates and incorporates by this reference all preceding paragraphs of this Complaint, and all evidence presented in Case No. 2:23-cv-00785 and each of the other 35+ cases which have been filed in this matter beginning in May of 2019.
7. Mr. Craig McCullough, as a senior partner of the LDS affiliated law firm of Kirton McConkie, committed Fraudulent Misrepresentation and deceived Plaintiff Max and Joyce Eliason into believing he and McConkie represented them as Settlers in May of 2013.

8. Kirton McConkie admitted to the undisclosed Conflict of Interest in February of 2019 stating they were unlawfully representing Lisa Stephens as one of the Beneficiaries instead of those they were paid to protect.
9. This theft has never been challenged by Kirton McConkie or the judges of the State of Utah or the Department of Justice since the first complaint was filed in March of 2019.
10. The judges from the State of Utah and the United States Department of Justice are knowingly refusing to prosecute felons who have committed over 50 felony Rico crimes each of which carries a maximum penalty of 20 years per count.
11. Included as defendants in the matter, are dozens of attorneys and judges and officers of the LDS Church including President Dallin H Oaks as the prophet to be of the Church upon the death of Russel M Nelson.
12. These defendants are all considered “getaway drivers” as it pertains to the laws of Rico, which exposes the Church and State as being one big mob who is committing treason against the United States of America while betraying every citizen who still believes in the term “Justice for All.”
13. Defendant Governor Spencer J Cox, has sworn an oath to uphold both the laws of the State of Utah, and the United States of America, and yet has chosen to protect the criminals and the LDS Church from being exposed as corrupted thugs.
14. In doing so, Governor Cox is denying victims each of their civil rights and is considered a member of the Conspiracy to commit dozens of Rico crimes, each of which he should be charged with should there ever be an honest judge left in the United States to prosecute these felons at large.

**FIRST CAUSE OF ACTION: CIVIL CONSPIRACY AGAINST DEFENDANT GOVERNOR SPENCER J COX.**

68. Plaintiff restates and incorporates by this reference all preceding paragraphs of this Complaint and asserts upon information and belief.

69. Defendant Cox has conspired with the dozens of judges from the State of Utah and the Department of Justice to protect the officers of the LDS Church at all costs regardless of what happens to the victims who have been pleading for assistance since McConkie admitted guilt to these crimes in February of 2019.

70. Starting in approximately 2013 and continuing until today, the defendants named in multiple cases over the past five years have knowingly and willfully conspired and agreed among themselves to wrongfully gain control of the assets of Joyce Eliason and Max Eliason, including all trusts, as well as control Eliason Enterprises, and Eliason Eight and deprive Plaintiff of income, assets, and earnings to which he was entitled.

71. The Defendants agreed in furtherance of this conspiracy to draft and have Joyce Eliason execute documents contrary to her intent, for which she had no authority, so that Lisa Stephens, Bryan Stephens, Mark Stephens, Laurie Eliason and Craig McCullough would have illegal control of the assets of Joyce Eliason, Max Eliason, Eliason Enterprises, Eliason Eight, LLC, 2015 Trust and 2016 Trust to the detriment of Plaintiff.

72. Defendants in furtherance of their conspiracy used the legal system and have liquidated the assets of Max Eliason upon the death of Joyce Eliason instead of awaiting the death of the surviving spouse to properly distribute these assets.

73. It is estimated that Defendants in this aspect of the conspiracy have unlawfully drained over \$250 million in assets for their own benefit, and now refuse to account for even \$1.00; with Defendant Governor Cox refusing to compel Kirton McConkie to provide the Agent and Trustee with statutory accounting.

74. Defendants in their conspiracy have also unlawfully transferred assets out of Eliason Enterprises and Eliason Eight, LLC, the 2015 Eliason Family Trust and the 2016 Eliason Family Trust for their own personal benefit. The effect of these transfers was to deny Plaintiff income to which he was entitled as a member of the Company.



75. Defendants in this aspect of the conspiracy also agreed to under report income from mineral rights and not provide the correct amount of income to Plaintiff.

76. Plaintiff is likely entitled to even more than the stated amounts above but is unable to determine the true additional amounts due to the conspiracy and deception of Defendants.

## **SECOND CAUSE OF ACTION: THEFT AGAINST ALL DEFENDANTS**

77. Plaintiff restates and incorporates by this reference all preceding paragraphs of this Complaint and asserts upon information and belief.

78. Defendants by their wrongful acts, conspired to illegally take, and did illegally take property which was rightfully owned by Plaintiff and converted such property for their own use and benefit.

79. Defendants' wrongful acts include but are not limited to the liquidation of the assets of the Joyce S. Eliason Trust, underreporting oil royalty income, improperly transferring mineral rights away from Plaintiff, taking money from the accounts of Joyce Eliason and Max Eliason, improperly removing Plaintiff as manager of the two companies, depriving Plaintiff of income and ownership interest of the two companies, and diverting income to other sources.

## **THIRD CAUSE OF ACTION: BREACH OF FIDUCIARY DUTY AGAINST GOVERNOR SPENCER J COX**

80. Plaintiff restates and incorporates by this reference all preceding paragraphs of this Complaint and asserts upon information and belief.

81. Defendant Spencer J Cox as an elected official in the State of Utah, has sworn an oath to uphold the Constitution of the State of Utah and the United States of America.

82. As such, Mr. Cox has a Fiduciary Duty each of the citizens of the State of Utah including the Plaintiff's to protect their civil rights as provided by law.



83. Defendant Cox has breached this fiduciary duty to the victims, and most likely many others which have yet to be uncovered due to the ongoing conspiracy being carried out by each of the defendants related to this matter.

**FOURTH CAUSE OF ACTION: INTENTIONAL AND OR NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS AGAINST ALL DEFENDANTS**

84. Plaintiff restates and incorporates by this reference all preceding paragraphs of this Complaint and asserts upon information and belief.

85. Defendant acted intentionally, recklessly, or negligently in his actions towards Plaintiff.

86. Defendant's conduct was extreme and outrageous.

87. As a result of Defendant's actions Plaintiff suffered severe emotional distress.

88. Plaintiff's damages for the emotional distress he incurred will be determined at trial.

**FIFTH CLAIM FOR VICARIOUS LIABILITY AGAINST GOVERNOR COX AND THE STATE OF UTAH**

89. Plaintiff restates and incorporates by this reference all preceding paragraphs of this Complaint and asserts upon information and belief.

90. In addition to their separate, individual, and direct acts and omissions, Defendants acted for and on behalf of each other as agents, employees, attorneys, and/or representatives, in concert with one another and with the authority and agency to do so and within the course and scope of their respective relationships.

91. As a result, thereof, in addition to their separate, direct, and individual liability, Defendants are vicariously liable (through respondeat superior and all other potential theories) for the acts or omissions or each other.

## **PRAYER FOR RELIEF**

Plaintiff prays for a judgment against Defendant Cox and the State of Utah as follows:

1. An order demanding that Kirton McConkie and the LDS Church provide statutory accounting for all income and disbursements related to the estate of Max and Joyce Eliason.
2. An order granting Brett L Eliason the right to visit his own father without any interference by Lisa Stephens or Kirton McConkie.
3. An order declaring that Kirton and McConkie, and all its attorneys are disqualified from representing any of the Defendants in this action due to their impermissible conflict of interest.
4. A Jury Trial
5. \$1.00

A handwritten signature in black ink, appearing to read 'Veronique Eliason', written over a horizontal line.

Veronique Eliason, Agent, and Trustee for Plaintiff Max D Eliason